

JOHN C. CRUDEN
Assistant Attorney General
Environment and Natural Resources Division

JOSHUA H. VAN EATON (WA-39871)
BETHANY ENGEL (MA-660840)
Trial Attorneys
U.S. Department of Justice
P.O. Box 7611
Washington DC 20044-7611
Telephone: (202) 514-5474
Facsimile: (202) 514-0097
Email: Josh.Van.Eaton@usdoj.gov

Attorneys for Plaintiff United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 WHEREAS, on January 4, 2016, the United States filed its complaint (the
2 “Complaint”) against Defendants Volkswagen AG, Volkswagen Group of America, Inc.,
3 Volkswagen Group of America Chattanooga Operations, LLC, Audi AG, Dr. Ing. h.c. F. Porsche
4 AG, and Porsche Cars North America, Inc. (the “Defendants”);

5 WHEREAS, on February 25, 2016, the Court entered Pre-Trial Order No. 9 (Dkt.
6 1252), which, in Paragraph 5(A), permitted Plaintiffs to amend their complaints, add parties,
7 and/or add claims up to and through May 20, 2016;

8 WHEREAS, the Court entered a Stipulation and Order to Extend (1) Deadline To
9 Respond To The United States’ Complaint, and (2) Deadline To Amend Complaints (Dkt. 1399)
10 which extended the deadline for the Plaintiffs (other than the Federal Trade Commission) to amend
11 their complaints, add parties, and/or add claims without leave of Court up to and through June 20,
12 2016;

13 WHEREAS, the Court entered a Stipulation and Order to Extend the Deadline to
14 Amend Complaint (Dkt. 1583), which extended the deadline for the United States to amend its
15 complaint, add parties, and/or add claims without leave of the Court up to and through July 29, 2016;

16 WHEREAS, the United States and the Defendants have agreed to an extension of
17 time until September 15, 2016 for the United States to amend its complaint, add parties, and/or
18 add claims without leave of Court; and

19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
20 among the Parties, that the deadline for the United States to amend its complaint, add parties,
21 and/or add claims without leave of Court should be continued to September 15, 2016.

22

23

24

25

26

27

28

1 Dated: July 28, 2016

Respectfully submitted,

2 By: /s/ Bethany Engel

3 Joshua H. Van Eaton
josh.van.eaton@usdoj.gov
4 Bethany Engel
bethany.engel@usdoj.gov
Environmental Enforcement Section
5 Environment and Natural Resources Division
UNITED STATES DEPARTMENT OF
JUSTICE
P.O. Box 7611
7 Washington, DC 20044-7611
Telephone: (202) 514-6892
8 Facsimile: (202) 616-2427

9 *Coordinating Counsel for the United States*

10 Dated: July 28, 2016

Respectfully submitted,

11 By: /s/ Robert J. Giuffra, Jr.

12 Robert J. Giuffra, Jr.
giuffrjr@sullcrom.com
13 Sharon L. Nelles
nelless@sullcrom.com
14 William B. Monahan
monahanw@sullcrom.com
15 John G. McCarthy
mccarthyj@sullcrom.com
16 SULLIVAN & CROMWELL LLP
125 Broad Street
17 New York, New York 10004
Telephone: (212) 558-4000
18 Facsimile: (212) 558-3588

19 *Co-Liaison Counsel for the Volkswagen Group
Defendants*

20 Dated: July 28, 2016

Respectfully submitted,

21 By: /s/ Jeffrey L. Chase

22 Jeffrey L. Chase
jchase@herzfeld-rubin.com
23 Michael B. Gallub
mgallub@herzfeld-rubin.com
24 HERZFELD & RUBIN, P.C.
125 Broad Street
25 New York, New York 10004
Telephone: (212) 471-8500

26 *Co-Liaison Counsel for the Volkswagen Group
Defendants*

1 Dated: July 28, 2016

Respectfully submitted,

2

By: /s/ Cari K. Dawson

3

Cari K. Dawson
cari.dawson@alston.com
ALSTON & BIRD LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309
Telephone: (404) 881-7766

4

5

6 *Liaison Counsel for the Porsche Defendants.*

7

8

9 * * *

10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11
12 DATED: Lxn{ "4; , 2

13 
CHARLES R. BREYER
United States District Judge

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatories above.

Dated: July 28, 2016

/s/ Bethany Engel
Bethany Engel